

HEWLETT-PACKARD COMPANY  
Intellectual Property Administration  
P.O. Box 272400  
Fort Collins, Colorado 80527-2400



PATENT APPLICATION

ATTORNEY DOCKET NO. 10010316-1

IN THE

UNITED STATES PATENT AND TRADEMARK OFFICE

Inventor(s): Mehmet Sayal et al.

Confirmation No.: 8853

Application No.: 09/943,223

Examiner: Khatri, Anil

Filing Date: August 29, 2001

Group Art Unit: 2191

Title: METHOD AND SYSTEM FOR INTEGRATING WORKFLOW MANAGEMENT SYSTEMS WITH BUSINESS-TO-BUSINESS INTRACTION STANDARDS

Mail Stop Appeal Brief-Patents  
Commissioner For Patents  
PO Box 1450  
Alexandria, VA 22313-1450

**TRANSMITTAL OF APPEAL BRIEF**

Transmitted herewith is the Appeal Brief in this application with respect to the Notice of Appeal filed on February 13, 2008.

- The fee for filing this Appeal Brief is \$510.00 (37 CFR 41.20).  
 No Additional Fee Required.

(complete (a) or (b) as applicable)

The proceedings herein are for a patent application and the provisions of 37 CFR 1.136(a) apply.

- (a) Applicant petitions for an extension of time under 37 CFR 1.136 (fees: 37 CFR 1.17(a)-(d)) for the total number of months checked below:

1st Month  
\$120

2nd Month  
\$460

3rd Month  
\$1050

4th Month  
\$1640

- The extension fee has already been filed in this application.  
 (b) Applicant believes that no extension of time is required. However, this conditional petition is being made to provide for the possibility that applicant has inadvertently overlooked the need for a petition and fee for extension of time.

Please charge to Deposit Account 08-2025 the sum of \$ 00. At any time during the pendency of this application, please charge any fees required or credit any over payment to Deposit Account 08-2025 pursuant to 37 CFR 1.25. Additionally please charge any fees to Deposit Account 08-2025 under 37 CFR 1.16 through 1.21 inclusive, and any other sections in Title 37 of the Code of Federal Regulations that may regulate fees.

- A duplicate copy of this transmittal letter is enclosed.

I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail in an envelope addressed to:  
Commissioner for Patents, Alexandria, VA 22313-1450  
Date of Deposit: February 21, 2008

OR

I hereby certify that this paper is being transmitted to the Patent and Trademark Office facsimile number (571)273-8300.

Date of facsimile:

Typed Name: Joan Deasy

Signature: Joan Deasy

Respectfully submitted,

Mehmet Sayal et al.

By MSayal et al

W. Allen Powell

Attorney/Agent for Applicant(s)

Reg No. : 56,743

Date : February 21, 2008

Telephone : (281) 970-4545



IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Application of:  
Mehmet Sayal et al.

Serial No.: 09/943,223

Filed: August 29, 2001

For: METHOD AND SYSTEM FOR  
INTEGRATING WORKFLOW  
MANAGEMENT SYSTEMS WITH  
BUSINESS-TO-BUSINESS  
INTERACTION STANDARDS

§ Confirmation No.: 8853  
§ Group Art Unit: 2191  
§ Examiner: Khatri, Anil  
§ Atty. Docket: 10010316-1  
§ NUHP:0387/FLE/ POW

Mail Stop Appeal Brief-Patents  
Commissioner for Patents  
P.O. Box 1450  
Alexandria, VA 22313-1450

CERTIFICATE OF TRANSMISSION OR MAILING  
37 C.F.R. 1.8

I hereby certify that this correspondence is being transmitted by facsimile to the United States Patent and Trademark Office in accordance with 37 C.F.R. § 1.6(d), or is being transmitted via the Office electronic filing system in accordance with 37 C.F.R. § 1.6(a)(4), or is being deposited with the U.S. Postal Service with sufficient postage as First Class Mail in an envelope addressed to: Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450, on the date below:

February 21, 2008  
Date

Joan Deasy

**APPEAL BRIEF PURSUANT TO 37 C.F.R. §§ 41.31 AND 41.37**

This Appeal Brief is being filed in furtherance to the Notice of Appeal electronically filed and received by the U.S.P.T.O. on February 13, 2008. Appellants assert that a final Board decision has not been made on the prior appeal. Accordingly, the previously paid appeal fees should be applied to the present appeal in accordance with M.P.E.P. § 1204.01 and 37 C.F.R. §§ 41.20 and 41.37. However, if the previously paid fees are insufficient, the Commissioner is authorized to charge any required fees to Deposit Account No. 08-2025; Order No. 10010316-1 (NUHP:0387).

1. **REAL PARTY IN INTEREST**

The real party in interest is Hewlett-Packard Development Company, LP, the Assignee of the above-referenced application by virtue of the Assignment to Hewlett-Packard Development Company, LP, recorded at reel 014061, frame 0492, and dated September 30, 2003. Hewlett-Packard Development Company, LP is a wholly-owned subsidiary of

Hewlett-Packard Company. Accordingly, Hewlett-Packard Development Company, LP, will be directly affected by the Board's decision in the pending appeal.

**2. RELATED APPEALS AND INTERFERENCES**

Appellants are unaware of any other appeals or interferences related to this Appeal. The undersigned is Appellants' legal representative in this Appeal.

**3. STATUS OF CLAIMS**

Claims 1-18 are currently pending, are currently under final rejection and, thus, are the subject of this Appeal.

**4. STATUS OF AMENDMENTS**

As the instant claims have not been amended at any time, there are no outstanding amendments to be considered by the Board.

**5. SUMMARY OF CLAIMED SUBJECT MATTER**

Embodiments of the present invention relate generally to the field of electronic business technology. *See Application, page 2, lines 5-7.* Specifically, present embodiments relate to a system and method for integrating workflow management systems with business-to-business ("B2B") interaction standards (e.g., RosettaNet B2B interaction standards). *See id. at page 2, lines 5-7; see also page 5, lines 13-16.* Present embodiments enable automated, template-driven generation of processes and services that can interact according to B2B interaction standards. *See id. at page 8, line 9 – page 9, line 4.*

According to some embodiments, an automatic B2B template generator is provided for supporting workflow design. *See id.* The B2B template generator automatically generates process templates and service templates based either on a description of a B2B interaction standard that is received or a structured representation of the B2B interaction standard. *See id.* When the B2B template generator receives the description of the B2B interaction standard as input, the B2B template generator first converts the description into a structured representation. *See id.* A process template may be automatically generated based on the structured representation. *See id.* The template (e.g., B2B service template or B2B

process template) may be utilized by a user to design both quickly and efficiently a complete process (e.g., a workflow with B2B interaction points). *See id.*

The Application contains three independent claims, namely, claims 1, 11, and 17, all of which are the subject of this Appeal. The subject matter of these claims is summarized below.

With regard to the aspect of the invention set forth in independent claim 1, discussions of the recited features of claim 1 can be found at least in the below-cited locations of the specification and drawings. By way of example, an embodiment in accordance with the present invention relates to a method for supporting workflow design (e.g., 240). *See Application, page 12, lines 7-16; see also page 13, line 7 – page 14, line 27; see also page 16, lines 6-8; see also Fig. 2.* The method comprises receiving (e.g., 210) a description (e.g., 214) of a business-to-business interaction standard. *See Application, page 8, lines 18-25; see also page 13, lines 1-16; see also page 16, lines 1-8; see also page 16, lines 1-12; see also Fig. 2.* The method also comprises converting (e.g., 220) the description (e.g., 214) of business-to-business interaction standard to a structured representation (e.g., 224) of the business-to-business interaction standard. *See Application, page 8, lines 21-25; see also page 13, lines 17-23; see also page 16, lines 1-12; see also page 26, lines 8-17; see also Fig. 2.* Further, the method comprises automatically generating (e.g., 230) at least one process template (e.g., 174, 178, 234) based on the structured representation (e.g., 224) of the business-to-business interaction standard, and using the process template (e.g., 174, 178, 234) to design (e.g., 240) a workflow (e.g., 244). *See Application, page 8, line 25 – page 9, line 4; see also page 13, lines 1-5; see also page 13, line 24 – page 14, line 17; see also page 15, lines 14-27; see also page 16, lines 13-27; see also page 19, line 31 – page 20, line 21; see also page 26, line 19 – page 27, line 14; see also Fig. 1, Fig 2, and Fig. 3.*

With regard to the aspect of the invention set forth in independent claim 11, discussions of the recited features of claim 11 can be found at least in the below-cited locations of the specification and drawings. By way of example, an embodiment in accordance with the present invention relates to a method for supporting workflow design (e.g., 240). *See Application, page 12, lines 7-16; see also page 13, line 7 – page 14, line 27;*

*see also* page 16, lines 6-8; *see also* Fig. 2. The method comprises receiving (e.g., 210) a high-level process definition (e.g., 214). *See Application*, page 8, lines 18-25; *see also* page 13, lines 1-16; *see also* page 16, lines 1-8; *see also* page 16, lines 1-12; *see also* Fig. 2. The method also comprises converting (e.g., 220) the high-level process definition (e.g., 214) into a structured data and flow (e.g., 224). *See Application*, page 8, lines 21-25; *see also* page 13, lines 17-23; *see also* page 15, lines 14-27; *see also* page 16, lines 1-12; *see also* page 26, lines 8-17; *see also* Fig. 2. The method also comprises automatically extracting (e.g., 230) at least one business-to-business (B2B) interaction point (e.g., 238). *See Application*, page 13, lines 24-27; *see also* page 15, lines 14-27; *see also* Fig. 2. Further, the method comprises generating a business-to-business (B2B) service template for the extracted interaction point. *See Application*, page 8, line 15 – page 9, line 4; *see also* page 13, lines 1-5 and lines 24-27; *see also* page 15, line 1 – page 16, line 27; *see also* Fig. 1, Fig. 2, and Fig. 3.

With regard to the aspect of the invention set forth in independent claim 17, discussions of the recited features of claim 17 can be found at least in the below-cited locations of the specification and drawings. By way of example, an embodiment in accordance with the present invention relates to a system (e.g., 100) for supporting the design of workflows (e.g., 240). *See Application*, page 11, line 10 – page 12, line 16; *see also* page 13, line 7 – page 14, line 27; *see also* page 16, lines 6-8; *see also* Fig. 1 and Fig. 2. The method comprises a structured process definition generator (e.g., 110, 150) for receiving a description of a business-to-business interaction standard and responsive thereto for generating a structured business-to-business process definition (e.g., 214). *See Application*, page 12, lines 7-14; *see also* page 17, lines 1-20; *see also* Fig. 1 and Fig. 2. The system also comprises a process template generator (e.g., 170) for automatically generating a business-to-business process template (e.g., 174, 178, 234) based on a structured business-to-business process definition (e.g., 214); *see also* Fig. 1 and Fig. 2. *See Application*, page 12, lines 3-6; *see also* page 13, lines 1-5; *see also* page 15, line 1 – page 16, line 27; *see also* Fig. 1 and Fig. 2. Further, the system (e.g., 100) comprises a process template repository (e.g., 120) for storing the business-to-business process templates (e.g., 174, 178, 234). *See Application*, page 12, lines 3-6; *see also* page 12, lines 15-23; *see also* Fig. 1.

**6. GROUNDS OF REJECTION TO BE REVIEWED ON APPEAL**

**First Ground of Rejection for Review on Appeal:**

Appellants respectfully urge the Board to review and reverse the Examiner's first ground of rejection in which the Examiner rejected claims 1-18 under 35 U.S.C. § 103(a) as being obvious over ICL Enterprises, *A Common Object Model Discussion Paper*, Document Number WfMC-TC-1022, 1998 (hereinafter "ACOMDP") in view of Anderson et al., *Workflow Interoperability – Enabling E-Commerce*, April 1, 1999, [www.wfmc.org](http://www.wfmc.org) (hereinafter "Anderson").

**7. ARGUMENT**

As discussed in detail below, the Examiner has improperly rejected the pending claims. Further, the Examiner has misapplied long-standing and binding legal precedents and principles in rejecting the claims under 35 U.S.C. § 103. Accordingly, Appellants respectfully request full and favorable consideration by the Board, as Appellants assert that claims 1-18 are currently in condition for allowance.

**A. First Ground of Rejection:**

The Examiner rejected claims 1-18 under 35 U.S.C. § 103(a) as being obvious over ACOMDP in view of Anderson. Specifically, with regard to independent claims 1, 11 and 17, the Examiner stated:

*ACOMDP teaches:*

- receiving a description of a business-to-business interaction standard (page 9 item 3.2, Internet centric workflow: (2) "the ability to transfer a business process...transferred during process enactment");
- converting the description of business-to-business interaction standard to a structured representation of the business-to-business interaction standard (page 4, item 2. Current architecture: 2<sup>nd</sup> paragraph, "A standardized API model (WAPI) is provided for communication between software application and the workflow...distributed platforms). *ACOMDP doesn't teach explicitly* automatically generating at least one process template based on the structured representation of the business-to-business interaction

standard; and using the process template to design a workflow. However, *Anderson et al* teaches automatically generating at least one process template based on the structured representation of the business-to-business interaction standard (page 7, 3<sup>rd</sup> paragraph Assessing Interoperability: “The WfMC interoperability standard are design to allow user of...workflow engines); and

using the process template to design a workflow (page 3, 3<sup>rd</sup> paragraph, “Each new process that is started on a workflow...given process instance). Therefore, it would have been obvious to a person of ordinary skill in the art at the time of the invention was made to incorporate B2B interaction in workflow model. The modification would have been obvious because one of ordinary skill in the art would have been motivated to combine teaching into developing or creating a workflow model from existing model to interact in business-to-business environment to provide commonality to different vendor a common platform to perform business activities.

Office Action mailed November 16, 2007, pages 2-3 (emphasis in original).

**1. The Examiner has failed to establish a *prima facie* case of obviousness because the cited references fail to disclose each and every feature recited in the independent claims.**

The burden of establishing a *prima facie* case of obviousness falls on the Examiner. *Ex parte Wolters and Kuypers*, 214 U.S.P.Q. 735 (P.T.O. Bd. App. 1979). To establish *prima facie* obviousness of a claimed invention, *all* the claim limitations must be taught or suggested by the prior art. *In re Royka*, 180 U.S.P.Q. 580 (C.C.P.A. 1974) (emphasis added).

Turning to the claims, independent claim 1 recites, inter alia, “receiving a description of a business-to-business interaction standard ... converting the description ... to a structured representation of the business-to-business interaction standard ... automatically generating at least one process template based on the structured representation ... [and] using the process template to design a workflow.” Independent claim 11 recites, inter alia, “receiving a high-level process definition ... converting the high-level process definition into a structured data and flow ... automatically extracting at least one business-to-business (B2B) interaction point ... [and] generating a business-to-business (B2B) service template for the extracted interaction point.” Independent claim 17 recites, inter alia, “a structured process definition

generator for receiving a description of a business-to-business interaction standard and ... for generating a structured business-to-business process definition ... a process template generator for automatically generating a business-to-business process template ... and a process template repository for storing the business-to-business process templates.”

The Appellants assert that the Examiner has failed to establish a *prima facie* case of obviousness because the cited references fail to disclose each and every feature recited in the independent claims. For example, the Examiner submitted that ACOMDP teaches “receiving a description of a business-to-business interaction standard,” as recited in claim 1. *See* Office Action mailed November 16, 2007, page 2. However, the Appellants assert that the cited portion of ACOMDP fails to even mention *receiving a business-to-business interaction standard*. To emphasize this deficiency, the cited portion of ACOMDP is reproduced below:

### **3.2 Internet-centric Workflow**

The WfMC has recently published a White Paper “Workflow & Internet, Catalysts for Radical Change” [Martin Ader]. This identifies how the convergence of workflow and Internet technologies can be complementary in establishing a framework for the control of business process within an open, electronic trading environment. Much of the standardisation required to support this has already been achieved, although there are certain areas where a more distributed workflow control model can bring additional value to this style of operation. [*See comments from the WfMC meeting, Windsor 1997.*]

1. Distribution of work items via a “push” interface to facilitate scaleable operation in very large public networks. Associated with this is the potential visibility of worklists as network addressable objects in their own right.
2. The ability to transfer a business process (for example, to a service provider within an open network domain) as a work object in its own right, as an alternative to an individual activity or workitem. The current sub-process model constrains this by a pre-partitioning of the business process model into sub-processes aligned typically to organisational boundaries. A dynamic form of binding a (sub-)process to a service provider organisation is desirable to provide this flexibility. The implication is that some form of standardised representation of the operational business process instance is required, which could be dynamically

transferred during process enactment [*a non-trivial problem; note that XML may also have a role to play in this area.*].

These requirements are broadly in line with elements of the peer-peer interoperability model described within the *WfMC Reference Model* document and discussed earlier in this paper. Ideally the above requirements would be met by a general abstraction of work units ranging from a business process to an individual work item.

*[It is, of course, important that any solution should not constrain the choice of workflow technology within a service domain so these aspects of operation should be independent of the use of particular component technology by various service providers.]*

ACOMDP, page 9, section 3.2 (emphasis in original).

Clearly, ACOMDP does not teach the *business-to-business interaction standard*, as recited in claim 1, much less receiving a description of such a standard. Indeed, the Appellants emphasize that merely indicating the desirability of transferring a “business process … as a work item in its own right” is not equivalent to “*receiving a description of a business-to-business interaction standard,*” as recited in claim 1. (Emphasis added). Further, ACOMDP appears to suggest that transferring a business process could “ideally” be achieved by “a general abstraction of work units ranging from a business process to an individual work item.” ACOMDP, page 9, section 3.2. This clearly does not indicate that a description of a business-to-business interaction standard is being received. Further, the use of the term “ideally” suggests that ACOMDP is not enabled with respect to transferring a business process. Accordingly, Appellants submit that ACOMDP fails to disclose “*receiving a description of a business-to-business interaction standard,*” as recited in claim 1. Likewise, Appellants assert that ACOMDP fails to disclose “*receiving a high-level process definition,*” as recited in claim 11, or “*a structured process definition generator for receiving a description of a business-to-business interaction standard,*” as recited in claim 17. Additionally, Appellants assert that Anderson does not remedy the deficiencies of ACOMDP. Indeed, Appellants have asserted throughout the prosecution history that Anderson is deficient in this regard and merely discloses participating in E-Commerce.

Appellants assert that ACOMDP fails to disclose “*converting* the description of business-to-business interaction standard to a *structured representation* of the business-to-business interaction standard,” as recited in claim 1. (Emphasis added). “To emphasize this deficiency, the portion of ACOMDP cited by the Examiner as teaching this feature is set forth below:

A standardised API model (WAPI) is provided for communication between software applications and the workflow enactment service. The API model is essentially (and intentionally) independent of any underlying component distribution mechanism, since many different construction paradigms are used by workflow system vendors. The mechanism for underlying communication between components is not specified by the Coalition; however an underlying RPC service is a typical common approach, although some vendors provide interaction between various system components via email or via shared document/object stores, or other approaches. The WfMC WAPI specification assumes that vendors will provide appropriate stubs or code hooks to support client application access to the workflow enactment service from distributed platforms.

ACOMDP, page 4, section 2, second paragraph.

Appellants emphasize that a model provided for communication between software applications (e.g., a standardized API model) is not equivalent to *converting* the description of a business-to-business interaction standard to a *structured representation* of the business-to-business interaction standard. Indeed, according to Appellants’ best understanding, ACOMDP merely teaches a mechanism for communication between components. *See* ACOMDP, page 4, section 2, second paragraph. Examples of the communication disclosed by ACOMDP appear to include email and shared documents. *Id.* This has no apparent relationship to converting a business-to-business interaction standard to a structured representation. Further, as discussed throughout the prosecution history, Anderson is also deficient in this regard. Accordingly, whether consider separately or in a hypothetical combination, the cited references fail to disclose all of the recited features of claim 1. Likewise, the cited references fail to disclose “*converting* the high-level process definition into a *structured data and flow*,” or “a structured process definition generator … for

*generating a structured business-to-business process definition,”* as recited in claims 11 and 17, respectively.

Additionally, ACOMDP and Anderson, whether considered separately or in hypothetical combination, fail to disclose “automatically generating at least one *process template* based on the structured representation of the business-to-business interaction standard,” as recited in claim 1. The Examiner essentially admitted that ACOMDP fails to disclose this feature. *Id.* Further, Appellants find no disclosure whatsoever of a *process template* in the portion of Anderson cited by the Examiner. To emphasize this deficiency, the portion of Anderson cited by the Examiner as teaching this feature of claim 1 is reproduced below:

The WfMC Interoperability Standards are designed to allow users of workflow products to implement processes that flow across organisational and technological barriers. A difficulty faced by the authors of the Standard is that different workflow engines are founded on different conceptual models and have different behavioural characteristics and capabilities that affect the way in which they can support interoperability with other workflow engines.

Anderson, page 7, third paragraph.

The Examiner has not pointed to anything in the prior art resembling generation of a template based on a structured representation of a business-to-business interaction standard. Appellants stress that the ACOMDP appears to indicate that authors develop each WfMC Standard to address difficulties in interoperability between specific work flow engines because of different conceptual models, behavioral characteristics, and capabilities. Accordingly, Appellants assert that the disclosure relating to the WfMC in ACOMDP does not include *generating a process template based on the structured representation of a business-to-business interaction standard*, as recited in claim 1. Likewise, Appellants assert that the cited references fail to disclose “generating a business-to-business (B2B) *service template* for the extracted interaction point,” or “a process template generator for automatically generating a business-to-business *process template* based on a structured business-to-business process definition,” as recited in claims 11 and 17, respectively.

The ACOMDP and Anderson references, whether considered separately or in a hypothetical combination, also fail to disclose “using the process template to design a work flow,” as recited in claim 1. To emphasize this deficiency, the portion of Anderson cited by the Examiner as teaching this feature of claim 1 is reproduced below:

Each new process that is started on a workflow engine is known as a *process instance*. A *process instance* is a defined thread of activity that is being *enacted* (managed) by a workflow engine. Most workflow engines can report on the current status of a given process instance.

Anderson, page 3, third paragraph (emphasis in original).

Appellants stress that the terms “process instance” are defined by Anderson as referring to a “defined thread of activity that is being *enacted* (managed) by a workflow engine.” (Emphasis in original). This definition does not correspond to the recited process template. Accordingly, the disclosure relating to enacting a process instance in Anderson does not teach “using the process template to design a work flow,” as recited in claim 1. Further, the ACOMDP reference does not appear to remedy this deficiency. Indeed, the Examiner did not even suggest that ACOMDP discloses this feature.

The Examiner did not address the subject matter of independent claims 11 and 17 with any specificity. Indeed, in the Office Action, the Examiner essentially failed to address any distinctions between claims 1, 11, and 17. While the Applicant does not agree with the Examiner addressing these claims together, insomuch as the Examiner’s rejection is identical on all of these claims, claims 11 and 17 are also believed to be patentable in view of reasons set forth above.

Further, Appellants specifically assert that the cited references are deficient with respect to the recitation in claim 17 of “a process template repository for storing the business-to-business process templates.” Again, the Examiner did not specifically address claim 17. However, based on the Appellants’ best understanding of the Examiner’s previous arguments, Appellants assert that ACOMDP merely teaches a repository for storing “process definition data.” Accordingly, Appellants assert that the cited references do not appear to

contain any discernable reference to a process template repository for storing the business-to-business process templates, as recited in claim 17.

With regard to the Examiner's rejection of dependent claims 3 and 14, Appellants assert that the Examiner appears to have taken the cited portion of Anderson out of context. Indeed, the illustrated "order fulfillment scenario" and "order fulfillment process flow diagram" of Anderson do not appear to relate to the recitations of claims 3 and 14 corresponding to defining transitions for each state and defining states for each transition.

Regarding the Examiner's rejection of dependent claim 7, as set forth above, Appellants assert that the cited references fail to disclose automatically generating a process template based on the structured representation of the business-to-business interaction standard. Accordingly, the cited references certainly fail to disclose "automatically converting the structured data and flow into at least one process template that is specific to a particular workflow management system," as recited in claim 7.

With regard to the Examiner's rejection of dependent claims 8 and 18, Appellants reiterate that the cited references fail to disclose "a process template repository," as discussed with respect to claim 17. Further, Appellants assert that the cited references fail to disclose a "service template repository." Accordingly, the cited references are deficient with respect to the recitation of "storing template into a process template repository ... and storing the service templates into a service template repository," as recited in claim 8, and "a service template repository," as recited in claim 18.

With regard to dependent claim 12, Appellants assert that the cited references fail to disclose "automatically extracting a plurality of business-to-business (B2B) interaction points; and generating a business-to-business (B2B) service template for each extracted interaction point." First, with regard to extracting business-to-business interaction points, the Examiner merely cited a portion of Anderson that appears to have nothing to do with business-to-business interaction points, much less automatic extraction of such points. Further, with regard to generating a service template, it is unclear what the Examiner is

suggesting. Indeed, the Examiner appears to have cited a discussion of a compatibility matrix, which Appellants assert is deficient with respect to the recited feature.

For the reasons set forth above, the Appellants respectfully request that the Board overrule the Examiner's rejections under 35 U.S.C. § 103 of independent claims 1, 11 and 17 and the claims respectively depending therefrom.

**Conclusion**

Appellants respectfully submit that all pending claims are in condition for allowance. However, if the Examiner or Board wishes to resolve any other issues by way of a telephone conference, the Examiner or Board is kindly invited to contact the undersigned attorney at the telephone number indicated below.

Respectfully submitted,

Date: February 21, 2008



W. Allen Powell  
Reg. No. 56,743  
(281) 970-4545

**Correspondence Address:**

IP Administration  
Legal Department, M/S 35  
HEWLETT-PACKARD COMPANY  
P.O. Box 272400  
Fort Collins, CO 80527-2400

8. **APPENDIX OF CLAIMS ON APPEAL**

**Listing of Claims:**

1. A method for supporting workflow design comprising the steps of:
  - a) receiving a description of a business-to-business interaction standard;
  - b) converting the description of business-to-business interaction standard to a structured representation of the business-to-business interaction standard;
  - c) automatically generating at least one process template based on the structured representation of the business-to-business interaction standard; and
  - d) using the process template to design a workflow.
2. The method of claim 1 wherein the description of an electronic business-to-business interaction standard includes a description of one of RosettaNet, CBL, EDI, OSI, and cXML.
3. The method of claim 1 wherein converting the description of the electronic business-to-business interaction standard to a structured representation of the business-to-business interaction standard includes
  - for each state, defining all income transitions and all outgoing transitions; and
  - for each transition, defining a source state and a target state.
4. The method of claim 1 wherein converting the description of the electronic business-to-business interaction standard to a structured representation of the business-to-business interaction standard further includes
  - representing data in a structured form by employing a mark-up language.

5. The method of claim 1 wherein the structured process definition includes structured data and structured data flow.
6. The method of claim 1 wherein the structured process definition includes an XMI that includes at least one XML document.
7. The method of claim 1 wherein automatically converting the structured data and flow into at least one process template includes automatically converting the structured data and flow into at least one process template that is specific to a particular workflow management system.
8. The method of claim 1 further comprising the steps of:
  - storing the process templates into a process template repository; wherein the process templates are accessible to a workflow designer; and
  - storing the service templates into a service template repository; wherein the service templates are accessible to a workflow designer.
9. The method of claim 1 wherein using the process template to design a workflow includes
  - retrieving a process template from the process template repository; and
  - adding at least one local service to the process template.
10. The method of claim 1 wherein using the process template to design a workflow includes
  - designing a process that includes a plurality of local services; and
  - adding at least one interaction point service to the process.

11. A method for supporting workflow design comprising the steps of:
  - a) receiving a high-level process definition;
  - b) converting the high-level process definition into a structured data and flow;
  - c) automatically extracting at least one business-to-business (B2B) interaction point; and
  - d) generating a business-to-business (B2B) service template for the extracted interaction point.
12. The method of claim 11 further comprising:

automatically extracting a plurality of business-to-business (B2B) interaction points; and

generating a business-to-business (B2B) service template for each extracted interaction point.
13. The method of claim 11 wherein the business-to-business (B2B) service template confirms to a business-to-business interaction standard that includes one of RosettaNet, CBL, EDI, OBI, and cXML.
14. The method of claim 11 wherein converting the high-level process definition into a structured data and flow includes

for each state, defining all incoming transitions and all outgoing transitions; and

for each transition, defining a source state and a target state.
15. The method of claim 11 wherein converting the high-level process definition into a structured data and flow includes

representing data in a structured form by employing a mark-up language.

16. The method of claim 11 wherein the structured process definition includes an XMI that includes at least one SML document.
17. A system for supporting the design of workflows comprising:
  - a structured process definition generator for receiving a description of a business-to-business interaction standard and responsive thereto for generating a structured business-to-business process definition;
  - a process template generator for automatically generating a business-to-business process template based on a structured business-to-business process definition; and
  - a process template repository for storing the business-to-business process templates.
18. The system of claim 17 further comprising:
  - a service template repository for storing business-to-business service templates.

9. **APPENDIX OF EVIDENCE**

None.

10. **APPENDIX OF RELATED PROCEEDINGS**

None.